

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Implementation of Section 621(a)(1) of the)	MB Docket No. 05-311
Cable Communications Policy Act of 1984)	
as amended by the Cable Television)	
Consumer Protection and Competition Act)	
of 1992)	

REPLY COMMENTS
of
Coral Springs, Florida

The City of Coral Springs, Florida (“City”) respectfully submits the following reply comments in response to the above captioned Notice of Proposed Rulemaking, FCC 05-189. (“NPRM”)¹

The City is categorically refuting the BellSouth allegations referenced in the pages 18, 35 and Rawls Declarations ¶¶ 12-13. The City’s past negotiations with BellSouth for cable franchise services were based on good public policy, reasonable service/programming requirements, and comparable to the prevailing cable industry standards and practices. Contrary to the BellSouth allegations, the City subsequently renegotiated and incorporated those so called “unreasonable cable franchise requirements” in a Non-exclusive Cable Franchise Agreement with Advanced Cable Communications, the incumbent cable operator in Coral Springs.

¹ *In the Matter of implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984, as amended by the Cable Television and Consumer Competition Act of 1992*, MB Docket No. 05-255, Notice of Proposed Rulemaking (released November 18, 2005).

BellSouth withdrew its applications for a cable franchise when it became clear that those applications would be granted only if BellSouth agreed to onerous build out requirements. The end result was that the video market in those two communities lost a viable wireline competitor, and customer choice suffered as a result.

The City hereby stands by its practice of the use of local franchise authority. Coral Springs is open to any qualified cable operator who is willing to provide cable services pursuant to local, state and federal laws.

CONCLUSION/CERTIFICATE OF SERVICE

For the reasons indicated above, the Commission should decline to intrude into local cable franchising.

Respectfully submitted - this 27th day of March 2006

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